

Dear Dr. Stokes:

In response to your agency's call for public comments on the use of non-animal (in vitro cell culture) methods to study the toxic effects of chemicals from acute (short-term) exposure, I am writing to urge you to adopt the new non-animal test methods immediately.

All government agencies should use in vitro cell culture tests to replace completely the use of animals in lethal dose tests.

At a minimum, all government agencies that currently require the acute animal-poisoning studies should immediately incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual replacement for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community.

Thank you.

Sincerely,
Terry Stella